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9
10 UNITED STATES DISTRICT COURT

11 SOUTHERN DISTRICT OF CALIFORNIA

12 **(HONORABLE JEFFREY T. MILLER)**

13 UNITED STATES OF AMERICA,

14) CASE NO. 08CR0690-JM

15 Plaintiff,

16) DATE: May 9, 2008

17) TIME: 11:00 A.M.

18 v.

19) NOTICE OF MOTIONS AND MOTIONS TO:

20 JESUS HERRERA-TORRES,

21)
22) Defendant.) (1) COMPEL DISCOVERY AND
23)) PRESERVE EVIDENCE;
24)) (2) SUPPRESS STATEMENTS; AND
25)) (3) GRANT LEAVE TO FILE FURTHER
26)) MOTIONS

27 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
28 MARK CONOVER, ASSISTANT UNITED STATES ATTORNEY:

29 PLEASE TAKE NOTICE that on May 9, 2008 at 11:00 a.m., or as soon thereafter as counsel may
30 be heard, defendant, Jesus Herrera-Torres, by and through his attorney, Anthony E. Colombo Jr., will ask
31 this Court to enter an order granting the following motions.

MOTIONS

Defendant, Jesus Herrera-Torres, by and through his attorney, Anthony E. Colombo Jr., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

- (1) Compel Discovery/Preserve Evidence;
- (2) Suppress Statements; and
- (3) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: April 14, 2008

/s/ Anthony E. Colombo Jr.
ANTHONY E. COLOMBO JR.
Attorney for Mr. Herrera-Torres
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